

KRAVITZ, SCHNITZER & JOHNSON, CHTD.
Attorneys
8985 S. Eastern Ave., Suite 200
Las Vegas, Nevada 89123

GARY E. SCHNITZER, ESQ.
Nevada Bar No. 395
KIMBERLEY A. HYSON, ESQ.
Nevada Bar No. 11611
KRAVITZ, SCHNITZER & JOHNSON, CHTD.
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Tele: (702) 362-6666
Fax: (702) 362-2203
Email: gschnitzer@ksjattorneys.com
Email: khyson@ksjattorneys.com

Jeffrey M. Tillotson (*pro hac vice*)
Jonathan R. Patton (*pro hac vice*)
TILLOTSON LAW
1807 Ross Avenue, Suite 325
Dallas, Texas 75201
Tele: (214) 382-3041
Fax: (214) 292-6564
Email: jtillotson@tillotsonlaw.com
Email: jpatton@tillotsonlaw.com

Attorneys for Defendant,
Nationstar Mortgage, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GEORGINA FORD, individually and as
Special Administrator of the ESTATE OF
MURRAY D. FORD,

Plaintiffs,

vs.

NATIONSTAR MORTGAGE, LLC,

Defendant.

Case No.: 2:16-cv-00344-RFB-PAL

**DEFENDANT NATIONSTAR
MORTGAGE, LLC'S PRELIMINARY
OBJECTIONS TO PLAINTIFFS'
EXHIBITS**

Defendant Nationstar Mortgage, LLC ("Nationstar") by and through its counsel,
KRAVITZ SCHNITZER & JOHNSON, CHTD. and Tillotson Law, P.C., hereby files its Preliminary
Objections to Plaintiffs' Exhibits, and states as follows:

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EXHIBIT	DESCRIPTION	OBJECTION
1	Sept 28, 2015 Payoff Statement	No Objection
2	Plaintiffs' Notice of Bankruptcy Filing	No Objection
3	Plaintiffs' Bankruptcy Discharge	No Objection
4	Email Chain Krieger/Ackerman	No Objection
5-A	Check from Murray Ford to Nationstar dated 4/4/2015	No Objection
5-B	Undated Email from Krieger to Murray Ford Telling Him Where to Mail Payments	Authenticity, Relevance
5-C	Copy of check and note from Murray Ford to Nationstar dated 5/27/15	No Objection
5-D	Copy of check and note from Murray Ford to Nationstar dated 7/5/2013	No Objection
5-E	Copy of check and note from Murray Ford to Nationstar dated 7/28/2015	No Objection
6	Letter from Nationstar (Chatman) to Fords dated 9/9/2015	Exhibit 6 appears to be two exhibits. It also includes a letter dated 9/15/2015 from Nationstar that should be a separate exhibit, so Nationstar objects as to authenticity and completeness.
7	Payment Coupon and copy of check from Murray Ford dated 9/25/2015	No Objection
8	9/26/2015 Notice of Error	Seems like there is an extra letter from Nationstar dated 9/15/2015 that should be a separate exhibit, so Nationstar objects as to authenticity and completeness.
9	9/30/2015 Notice of Error	No Objection
10	4/19/2010 Loan Modification with Bank of America	No Objection
11	Bank of America Change in Loan Servicer Letter dated 6/10/2013	No Objection
12	Nationstar June 30, 2017 10-Q filed with SEC	Relevance
13	Settlement Agreement	No Objection

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14	Nationstar Default Notice 10/6/2015	No Objection
15	Plaintiffs' Adjustable Rate Note dated 8/10/2004	No Objection
16	Declaration of Murry Ford	Hearsay
17	California Consent Order	Relevance (FRE 402); Prejudice (FRE 403); Improper Habit (FRE 406); Settlement (FRE 408); Document not produced; Foundation
18	New York Consent Order	Relevance (FRE 402); Prejudice (FRE 403); Improper Habit (FRE 406); Settlement (FRE 408); Document not produced; Foundation
19	Plaintiffs' 7/7/2015 letter to Nationstar CEO Jay Gray	Hearsay
20	Nationstar (Chatman) letter to Krieger dated 9/29/2015	No Objection
21	Annual Escrow Account Disclosure Statement	No Objection
22	Nationstar (Phillips) letter to Krieger dated 11/17/2015	No Objection
23	Nationstar 2017 Form 10-K Report with SEC	Relevance
24	Nationstar (Phillips) letter to Krieger dated 11/17/2015	Duplicate of Ex. 22
25	Plaintiffs' Letter to Krieger dated 10/14/2015	Hearsay, Relevance, Prejudice
26	Nationstar Loan Servicing Notes	No Objection
27	Krieger 12/21/2015 Letter to Nationstar	Relevance
28	Nationstar (Carolina Brito) 2/25/2016 Letter to Krieger	No Objection
29	Appears to be same as 28	Duplicate of 28

1 Nationstar reserves the right to assert additional objections based on the Court's rulings,
2 the evidence that is presented at trial, and/or any other new or changed circumstances.

3 DATED this 23rd day of May, 2018.

4 KRAVITZ, SCHNITZER
5 & JOHNSON, CHTD.

6 /s/ Kimberley A. Hyson, Esq.

7 _____
8 GARY E. SCHNITZER, ESQ.
9 Nevada Bar No. 395
10 KIMBERLEY A. HYSON, ESQ.
11 Nevada Bar No. 11611
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13 Las Vegas, NV 89123
14 Email: gschnitzer@ksjattorneys.com
15 Email: khyson@ksjattorneys.com

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17 JONATHAN R. PATTON, ESQ. (*Pro Hac Vice*)
18 **TILLOTSON LAW**
19 1807 Ross Avenue, Suite 325
20 Dallas, Texas 75201
21 Tele: (214) 382-3041
22 Fax: (214) 292-6564
23 Email: jtillotson@TillotsonLaw.com
24 Email: jpatton@TillotsonLaw.com
25 Attorneys for Defendant,
26 *Nationstar Mortgage, LLC*
27
28

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of May, 2018, and pursuant to F.R.C.P. 5(b) a true and correct copy of the foregoing **DEFENDANT NATIONSTAR MORTGAGE, LLC'S PRELIMINARY OBJECTIONS TO PLAINTIFFS' EXHIBITS** was filed via the Court's CM/ECF System and electronically served by the Court on all parties in interest listed as registered users.

/s/ Annette Cooper
an Employee of Kravitz, Schnitzer,& Johnson,
CHTD.

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Attorneys
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